

Defendant.

ASSENTED-TO MOTION TO AMEND PROTECTIVE ORDER

19. Non-Parties. As provided in the Stipulation and Agreement attached hereto as Attachment B, a non-party that is obligated to provide discovery in this action by deposition, production of documents or otherwise, may request the protections afforded and corresponding obligations set forth in this Order for confidential documents and information. Upon signing by all parties and the producing non-party, all shall be bound by the terms of Attachment B and the terms of this Order incorporated by reference therein.

4. The School further proposes to amend the Protective Order by adding Attachment B, the Stipulation and Agreement pursuant to which the third party would become bound by the Protective Order. A copy of proposed Attachment B is attached hereto as Exhibit 1.

5. A copy of the proposed Amended Protective Order, including proposed Paragraph 19 and proposed Attachment B, is attached hereto as Exhibit 2.

6. Apart from the changes explicitly referenced herein, the proposed Amended Protective Order does not alter or change the Protective Order entered in this matter.

7. No memorandum of law in support of this motion is necessary because the relief requested lies within the Court's sound discretion. See LR 7.1(a)(2).

8. Plaintiffs' counsel assents to the relief sought herein. See L.R. 7.1(c).

WHEREFORE, the School respectfully requests that the Court:

- A. Grant this Motion;
- B. Amend the Protective Order (Dkt. No. 24) as set forth herein and enter an Amended Protective Order in the form attached hereto as Exhibit 2; and
- C. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

ST. PAUL'S SCHOOL,

By its attorneys,

McLANE MIDDLETON,
PROFESSIONAL ASSOCIATION

Dated: November 15, 2017

By: /s/ Benjamin B. Folsom

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CERTIFICATE OF SERVICE

I hereby certify on this 15th day of November, 2017, this document was filed through the Electronic Case Filing System of the United States District Court for the District of New Hampshire and will be served electronically by the court to the Registered Participants identified in the Notice of Electronic Filing (NEF).

/s/ Benjamin B. Folsom